

1 “(1) under the laws of any foreign country, con-
2 sidering the tax system of such foreign country, a more
3 burdensome tax is imposed by such foreign country on
4 the transfer of estates of decedents who were citizens of
5 the United States and not residents of such foreign
6 country than the tax imposed by this subchapter on the
7 transfer of estates of decedents who were residents of
8 such foreign country,

9 “(2) such foreign country, when requested by the
10 United States to do so, has not acted to revise or reduce
11 such tax so that it is no more burdensome than the tax
12 imposed by this subchapter on the transfer of estates
13 of decedents who were residents of such foreign country,
14 and

15 “(3) it is in the public interest to apply pre-1967
16 tax provisions in accordance with this section to the
17 transfer of estates of decedents who were residents of
18 such foreign country,

19 the President shall proclaim that the tax on the transfer of
20 the estate of every decedent who was a resident of such for-
21 eign country at the time of his death shall, in the case of
22 decedents dying after the date of such proclamation, be
23 determined under this subchapter without regard to amend-
24 ments made to sections 2101 (relating to tax imposed),
25 2102 (relating to credits against tax), 2106 (relating to